IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

ETHICON WAVE 12 CASES LISTED IN EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF CHARLES HANES, MD FOR WAVE 12

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion and memorandum filed in relation to Charles Hanes, MD for Ethicon in Wave 11 Dkt. 8561 (motion), Dkt. 8564 (memorandum in support). Plaintiffs respectfully request that the Court exclude Charles Hanes' testimony, for the reasons expressed in the Wave 11 briefing. This notice applies to the following Wave 12 cases identified in Exhibit A attached hereto.

Dated: October 28, 2019 Respectfully submitted,

D. Renee Baggett

Renee Baggett, Esq. Bryan F. Aylstock, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

E-mail: rbaggett@awkolaw.com

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

816-701-1102

Fax 816-531-2372

tcartmell@wcllp.com

EXHIBIT A

Saylor, Barbara	2:14-cv-18321
Smith, Barbara D.	2:13-cv-20902
Webb, Kelly J.	2:13-cv-03083

CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett_____

D. Renee Baggett
Aylstock, Witkin, Kreis and Overholtz, PLC
17 E. Main Street, Suite 200
Pensacola, FL 32563
850-202-1010
850-916-7449
Rbaggett@awkolaw.com